



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. 8:25-cr-00140-FWS

Plaintiff,

I N F O R M A T I O N

v.

[18 U.S.C. § 1341: Mail Fraud;
18 U.S.C. § 1343: Wire Fraud;
18 U.S.C. § 981(a)(1)(C) & 28
U.S.C. § 2461(c): Criminal
Forfeiture]

TAE MIYAJI JONES,

Defendant.

The United States Attorney charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant TAE MIYAJI JONES ("JONES") resided in Orange County, within the Central District of California.

2. From at least as early as 2010 through her termination on October 20, 2023, defendant JONES was the Account Manager for a California based noodle corporation, S.F.

3. S.F. manufactured a variety of instant noodle products, which were distributed throughout the United States and Canada. S.F. was headquartered in Garden Grove, California, within the Central District of California.

1 4. S.F. conducted business with several vendors to facilitate
2 its business needs.

3 5. S.F. had a bank account ending in 0496 at Union Bank
4 ("Union Bank Account -0496"), which it used for transactions with its
5 various vendors.

6 6. Defendant JONES had a personal banking account with
7 American Express ("AMEX") ending in -91001.

8 7. Defendant JONES had personal banking accounts with Boeing
9 Employees' Credit Union ("BECU") ending in -6072, -0262, -6064,
10 -4417, -6606, -5447, -1265, -6614, -7771, and -8600.

11 8. Defendant JONES had a personal banking account with First
12 National Bank of Omaha ("FNBO") ending in -2962.

13 9. As S.F.'s Account Manager, defendant JONES's
14 responsibilities included administering S.F.'s accounting and
15 financial operations, including but not limited to, budgeting for
16 salaries, business expenses, regulatory and tax compliance;
17 accounting; managing and implementing internal financial controls;
18 managing relationships with external vendors; handling procurement of
19 manufacturing goods from such vendors; and identifying new business
20 opportunities for S.F. Defendant JONES had access to and control of
21 the S.F.'s financial systems, corporate accounts, and records.
22 Defendant JONES also had check signing authority in her role as
23 Account Manager.

24 10. Defendant JONES was prohibited by S.F. from using her
25 access to S.F.'s accounting systems to conduct any personal
26 transactions.

1 COUNTS ONE THROUGH SEVEN

2 [18 U.S.C. § 1341]

3 11. Paragraphs 1 through 10 of the Introductory Allegations of
4 this Information are realleged and incorporated as though fully set
5 forth herein.

6 A. THE SCHEME TO DEFRAUD

7 12. Beginning on a date unknown, but no later than December 31,
8 2017, and continuing through at least July 21, 2023, in Los Angeles
9 and Orange Counties, within the Central District of California, and
10 elsewhere, defendant TAE MIYAJI JONES, knowingly and with intent to
11 defraud, devised and executed a scheme to obtain monies and other
12 property owned by and in the custody and control of S.F., by means of
13 material false and fraudulent pretenses, representations, and
14 promises, and the concealment of material facts.

15 13. The fraudulent scheme operated and was carried out, in
16 substance, as follows:

17 a. Without the knowledge, consent, or approval of S.F.,
18 and in violation of S.F. policies and procedures, defendant JONES
19 would transfer and cause to be transferred S.F. funds from Union Bank
20 Account -0496 to personal accounts in her own name to finance
21 personal expenses including, among other things, home mortgages,
22 jewelry, car loans, and charges she incurred on her personal credit
23 cards.

24 b. Defendant JONES would falsify and cause to be
25 falsified S.F.'s account records in order to conceal her unauthorized
26 takings, which were material matters.

27 14. As a result of the scheme described above, defendant JONES
28 fraudulently obtained approximately \$2,894,441 from S.F.

1 B. EXECUTION OF THE FRAUDULENT SCHEME

2 15. On or about the dates set forth below, within the Central
 3 District of California, defendant JONES, for the purpose of executing
 4 and attempting to execute the above-described scheme to defraud,
 5 willfully caused the following items to be placed in an authorized
 6 depository for mail matter to be sent and delivered by the United
 7 States Postal Service, according to the direction thereon:

COUNT	DATE	ITEM MAILED
ONE	July 6, 2023	Check for \$42,600 from S.F.'s Union Bank Account -0496 to AMEX, P.O. Box 96001, Los Angeles, CA 90096 to be applied to defendant JONES's credit card balance on the account ending in -91001.
TWO	December 6, 2022	Check for \$58,800 from S.F.'s Union Bank Account -0496 to AMEX, P.O. Box 96001, Los Angeles, CA 90096 to be applied to defendant JONES's credit card balance on the account ending in -91001.
THREE	July 6, 2022	Check for \$42,300 from S.F.'s Union Bank Account -0496 to AMEX, P.O. Box, 96001, Los Angeles, CA 90096 to be applied to defendant JONES's credit card balance on the account ending in -91001.
FOUR	June 3, 2022	Check for \$46,800 from S.F.'s Union Bank Account -0496 to AMEX, P.O. Box, 96001, Los Angeles, CA 90096 to be applied to defendant JONES's credit card balance on the account ending in -91001.
FIVE	September 8, 2021	Check for \$16,800 from S.F.'s Union Bank Account -0496 to FNBO, P.O. Box 2557, Omaha, NE 68103 to be applied to defendant JONES's credit card balance on the account ending in -2962.
SIX	December 11, 2020	Check for \$29,650 from S.F.'s Union Bank Account -0496 to FNBO, P.O. Box 2557, Omaha, NE 68103 to be applied to defendant JONES's credit card balance on the account ending in -2962.

COUNT	DATE	ITEM MAILED
SEVEN	December 10, 2019	Check for \$48,600 from S.F.'s Union Bank Account -0496 to FNBO, P.O. Box 2556, Omaha, NE 68103 to be applied to defendant JONES's credit card balance on the account ending in -2962.

1 COUNTS EIGHT THROUGH TEN

2 [18 U.S.C. § 1343]

3 16. Paragraphs 1 through 10 of the Introductory Allegations of
4 this Information are realleged and incorporated as though fully set
5 forth herein.

6 A. THE SCHEME TO DEFRAUD

7 17. Beginning on a date unknown, but no later than on or about
8 December 31, 2017, and continuing through at least on or about July
9 21, 2023, in Los Angeles and Orange Counties, within the Central
10 District of California, and elsewhere, defendant TAE MIYAJI JONES,
11 knowingly and with intent to defraud, devised and executed a scheme
12 to obtain monies and other property owned by and in the custody and
13 control of S.F., by means of material false and fraudulent pretenses,
14 representations, and promises, and the concealment of material facts.

15 18. The fraudulent scheme operated and was carried out, in
16 substance, as follows:

17 a. Without the knowledge, consent, or approval of S.F.,
18 and in violation of S.F. policies and procedures, defendant JONES
19 would transfer and cause to be transferred S.F. funds from Union Bank
20 Account -0496 to personal accounts in her own name to finance,
21 personal expenses, including among other things, home mortgages,
22 jewelry, car loans, and charges she incurred on her personal credit
23 cards.

24 b. Defendant JONES would falsify and cause to be
25 falsified S.F.'s account records in order to conceal her unauthorized
26 takings, which were material matters.

27 19. As a result of the scheme described above, defendant JONES
28 fraudulently obtained approximately \$2,894,441 from S.F.

1 B. USE OF THE WIRES

2 20. On or about the dates set forth below, within the Central
3 District of California, and elsewhere, defendant JONES, for the
4 purpose of executing the above-described scheme to defraud, caused
5 the transmission of the following items by means of wire
6 communications in interstate commerce:

COUNT	DATE	ITEM WIRED
EIGHT	July 29, 2021	Electronic transfer of \$259,000 of S.F. funds from defendant JONES's BECU bank account ending in -6072 to Nationstar Mortgage, LLC.
NINE	August 2, 2019	Mobile check deposit for \$13,480 from S.F.'s Bank Account ending in -0496 to a BECU bank account which defendant JONES controlled.
TEN	November 20, 2018	Mobile check deposit for \$18,950 from S.F.'s Bank Account ending in -0496 to a BECU bank account which defendant JONES controlled.

1 FORFEITURE ALLEGATION

2 [18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 981(a)(1)(C) and Title 28, United States
7 Code, Section 2461(c), in the event of the defendant's conviction of
8 the offenses set forth in any of Counts One through Ten of this
9 Information.

10 2. The defendant, if so convicted, shall forfeit to the United
11 States of America the following:

12 (a) All right, title, and interest in any and all
13 property, real or personal, constituting, or derived from, any
14 proceeds traceable to the offenses, including but not limited to:

15 (i) The real property located at 125 Innocent Trail,
16 Madison, Alabama, 35756, more particularly
17 described at Assessor's Parcel Number
18 1701020002072000; and

19 (ii) The real property located at 69-555 Waikoloa
20 Beach Drive, Unit 2804, Waikoloa, Hawai'i, 96738,
21 more particularly described at Assessor's Parcel
22 Number 3-6-9-007-035-0166; and

23 (b) To the extent such property is not available for
24 forfeiture, a sum of money equal to the total value of the property
25 described in subparagraph (a).

26 3. Pursuant to Title 21, United States Code, Section 853(p), as
27 incorporated by Title 18, United States Code, Section 982(b), the
28 defendant, if so convicted, shall forfeit substitute property, up to

1 the total value of the property described in the preceding paragraph
2 if, as the result of any act or omission of said defendant, the
3 property described in the preceding paragraph, or any portion
4 thereof: (a) cannot be located upon the exercise of due diligence;
5 (b) has been transferred, sold to or deposited with a third party;
6 (c) has been placed beyond the jurisdiction of the court; (d) has
7 been substantially diminished in value; or (e) has been commingled
8 with other property that cannot be divided without difficulty.

9
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